

HEATHER E. WILLIAMS, #122664
Federal Defender
RACHELLE BARBOUR, #185395
Assistant Federal Defender
OFFICE OF THE FEDERAL DEFENDER
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant
JOSE MANUEL ONTIVEROS VERDUGO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No: 2:23-CR-0162-DAD
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER TO CONTINUE
)	STATUS CONFERENCE AND EXCLUDE
JORGE OMAR ARREDONDO-GARCIA, et)	TIME
al.,)	
Defendant.)	District Judge Dale A. Drozd
)	New Date: March 10, 2025
)	Time: 9:30 a.m.
)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the GOVERNMENT; PATRICK MCCARTHY, attorney for Defendant JORGE OMAR ARREDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the status conference currently set for Tuesday, December 17, 2024, be continued to Monday, March 10, 2025 at 9:30 a.m., and that time be excluded for preparation of counsel.

There is a protective order in this multi-defendant case. (Doc. 69.) The Government first produced discovery consisting of approximately 700 pages of Bates-stamped documents and over 73.9 gigabytes of native files, including cell phone databases and other items for defense review. The Government then produced over 1400 pages of additional protected discovery. A

1 third production of approximately 2000 pages and files of protected discovery was received in
2 March. The discovery includes dozens of audio files from wiretaps and many surveillance
3 videos. In October, the Government produced an additional number of audio and video files.
4

5 Since the start of the case, Defense counsel have been reviewing and analyzing the above,
6 conducting legal research, meeting with their clients, and otherwise preparing for trial. The
7 above tasks are ongoing, and the defense requires additional time to review discovery, discuss
8 the case with their clients and the Government, and continue to prepare. The parties believe that
9 failure to grant the requested continuance would deny defense counsel the reasonable time
10 necessary for effective preparation, taking into account the exercise of due diligence.

11 Accordingly, the parties stipulate and request that the Court exclude time between the
12 date of the filing of this stipulation through the new status conference date of March 10, 2025,
13 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
14 justice served by continuing the case as requested outweigh the interest of the public and the
15 defendant in a trial within the original date prescribed by the Speedy Trial Act.

16 Date: November 22, 2024

17 /s/ Patrick McCarthy
18 PATRICK McCARTHY
Attorney for Defendant
JORGE OMAR ARREDONDO-GARCIA

19 /s/ Dina Santos
20 DINA SANTOS
Attorneys for Defendant
21 GREGORIO ONTIVEROS VERDUGO

22 HEATHER E. WILLIAMS
23 Federal Defender

24 /s/ Rachelle Barbour
25 RACHELLE BARBOUR
Attorney for Defendant
26 JOSE MANUEL ONTIVEROS VERDUGO

27 /s/ Mark Reichel
28 MARK REICHEL
Attorney for Defendant
ALBERTO NAVARRO ZAPATA

/s/ Michael Long
MICHAEL LONG
Attorney for Defendant
WILFREDO F. REYES

DATED: November 22, 2024

PHILLIP A. TALBERT
United States Attorney

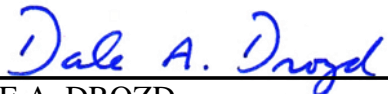
/s/ Adrian Kinsella
ADRIAN KINSELLA
Assistant U.S. Attorney
Attorney for the United States

O R D E R

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. Pursuant to the stipulation of the parties the status conference previously scheduled for December 17, 2024, is continued to Monday, March 10, 2025 at 9:30 a.m., and time is excluded under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). **However, no further continuances of the of the status conference in this case will be granted absent a compelling showing of good cause.**

IT IS SO ORDERED.

Dated: November 22, 2024


DALE A. DROZD
UNITED STATES DISTRICT JUDGE